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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

JUSTIN MICHAEL WILKENS,
Plaintiff,

v.

ROBERT EDWARDS, in his individual
capacity; **THE STATE OF OREGON;**
Defendants.

I.

Case No.: **6:14-cv-00907--MC**

**PLAINTIFF'S AMENDED PROPOSED
EXHIBIT LIST**

Plaintiff submits this list of exhibits he will likely introduce at trial (not including impeachment exhibits or additional exhibits that become necessary during the trial). Plaintiff also reserves the right to offer additional exhibits from Defendants Exhibit List.

1. In car video of incident
2. Screen shots and stills of video of incident
3. Emergency department medical records
4. Dr. Sheerin surgical records
5. Dr. Boespflug relevant medical records
6. ER X-rays
7. Post-surgery x-rays
8. Relevant medical bills; **8A, Slocum Orthopedics hardware removal estimate**
9. EMS report
10. photograph of Wilkens bruising near shoulder
11. photographs of motorcycle, gear, injury
12. photograph of Camaro police vehicle, scene
13. Calls for Service information log
14. Deputy Ware report (including citations)
15. Major Mike Bloom Notebook
16. Camaro relevant automotive records
17. Towing and Impound bills
18. Wheel Works cost estimates
19. OSP policy rules of conduct
20. OSP policy Use of force
21. OSP use of force continuum
22. OSP defensive tactics manual, relevant portions
23. OSP defensive tactic policy

- 24. OSP policy violator pursuit
- 25. OSP policy violator contact
- 26. WITHDRAWN
- 27. OSP policy high risk stop
- 28. OSP high risk handcuffing
- 29. OSP policy unmarked police vehicles
- 30. WITHDRAWN
- 31. WITHDRAWN
- 32. Helmet replacement estimate
- 33. **OSP policy tactical vehicle intervention**
- 34. **Edwards letter of reprimand**

Respectfully submitted January 4, 2016.

/s/ Lauren C. Regan
Lauren C. Regan (OSB # 970878)
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CERTIFICATE OF SERVICE

I certify that on January 4, 2016, I served or caused to be served a true and complete copy of the foregoing **PLAINTIFF'S AMENDED PROPOSED EXHIBIT LIST** on the party or parties listed below as follows:

<u> X </u>	Via CM / ECF Filing
<u> </u>	Via First Class Mail, Postage Prepaid
<u> X </u>	Via Email
<u> </u>	Via Personal Delivery

Heather J. Van Meter
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By: /s/ Lauren C. Regan
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